UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHANIE CLIFFORD A.k.a. STORMY DANIELS,

CASE NO. 1:18-cv-03842

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

Complaint Filed: April 30, 2018

STIPULATION TO TRANSFER ACTION TO THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

Plaintiff Stephanie Clifford ("Plaintiff") and Defendant Donald J. Trump ("Defendant")

(collectively, the "Parties") hereby jointly agree and stipulate as follows:

WHEREAS, on July 23, 2018, Defendant filed a Motion to Transfer Pursuant to 28

U.S.C. §1404(a) or, in the Alternative, to Dismiss or Stay Pursuant to the "First-Filed" Rule (the

"Motion");

WHEREAS, Defendant's Motion sought to transfer this action to the United States

District Court for the Central District of California;

WHEREAS, Plaintiff, despite filing an Opposition to Defendant's Motion on August 6,

2018, now consents to a transfer of the action to the Central District of California;

WHEREAS, transfer under section 1404(a) can be made "to any district or division to

which all parties have consented." 28 U.S.C. § 1404(a);

WHEREAS, after conferring, all Parties agree and consent to the transfer of this action to

the United States District Court for the Central District of California;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties,

through their counsel of record, that:

1. This action shall be transferred to the United States District Court for the Central

District of California.

2. Neither this Stipulation, nor the parties' consent to transfer, shall be construed as a

waiver of any legal or factual argument or position relating to this case.

IT IS SO STIPULATED.

Dated: August 8, 2018

Respectfully Submitted,

/s/ Catherine R. Keenan

Catherine R. Keenan, Esq.

Federal Bar No. CK 5925

66 Field Point Road

1

Greenwich, CT 06830 Tel: (203) 661-4200 Fax: (203) 661-3666

E-Mail: efile@greenwichlegal.com

Michael J. Avenatti (*Pro Hac Vice* application forthcoming)
AVENATTI & ASSOCIATES, APC
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
Tel: (040) 706, 7000

Tel: (949) 706-7000 Fax: (949) 706-7050

/s/ Charles J. Harder

Charles J. Harder HARDER LLP 260 Madison Avenue, 16th Floor New York, New York 10016

Tel: (212) 799-1400